Message

From: Marc J. Richards [MJRichards@tigheBond.com]
Sent: 3/2/2016 1:50:04 PM
To: Tisa, Kimberly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=58bc0878a00b4d5e95087b8f5b74239c-Tisa, Kimberly]
CC: mjrichards.tigheBond.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=821e32fb1618464f85178ef00a9fa690-mjrichards.]; 'Halmen, Vicki' [vhalmen@ipswichutilities.org]
Subject: Ipswich WWTP - Revised Risk-Based Plan
Attachments: Revised Risk-Based Cleanup Plan FINAL.PDF

Hi Kim –

Please find attached the response to comments related to the small unoccupied water treatment building.

Let me know if you have further questions.

Thanks,

Marc

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From: Tisa, Kimberly [mailto:Tisa.Kimberly@epa.gov]
Sent: Wednesday, March 04, 2015 4:30 PM
To: Marc J. Richards <MJRichards@tigheBond.com>
Cc: Tisa, Kimberly <Tisa.Kimberly@epa.gov>
Subject: Ipswich WWTP

Marc:

A risk-based disposal plan for PCB-remediation waste under 761.61(c) was submitted by Tighe & Bond on behalf of the Town of Ipswich to address PCB contamination in a former digester building located at the Waste Water Treatment Facility on Fowlers Lane. PCBs had previously been identified in paint on interior steel piping and on interior concrete walls. In 2012 the Town conducted a performance-based remedial action under 761.62 which included removal of paint from metal and porous surfaces. Metal surfaces were decontaminated to the NACE 2 standard in accordance with 761.69(b)(3)(B), which is a visual standard. Porous surfaces were sampled following paint removal where PCB concentrations > 50 ppm were identified.

The Town has submitted a plan to leave PCB-contaminated *porous surfaces* in-place based on a finding of no unreasonable risk. EPA has reviewed the plan and determined that the plan is incomplete as insufficient information was presented to support a finding that implementation of the proposed plan would not pose an unreasonable risk to health or the environment.

EPA's comments on the plan are provided below.

1. All information required to support a risk-based disposal plan was not included in the submitted information. For example, a risk-based disposal plan should consider remedial alternatives with estimated costs. While a few options were discussed (i.e., epoxy coatings/barriers) no other information was provided nor were other options, such as additional scarification to remove PCBs discussed. Other information may also be needed to support a remedial alternative (e.g., air sampling, etc), structural considerations, cost, etc.

   Please review the attached risk-based disposal option check list and ensure that all required and necessary information is provided.

2. Please provide the square footage of the building and square footage of wall surfaces where PCBs greater than (">") 1 ppm are present.

3. The certification required under 40 CFR § 761.61(a)(3)(i)(E) was not provided.

4. Page 1. It is indicated that paint was identified on interior concrete walls. However, subsequently there is reference to both concrete and CMU. As these two different material types are generally not considered the same, please clarify the construction of this building.

5. Page 2. 1st paragraph. There is a discussion of 2012 sampling associated with the aeration tank wall (PCB-03) and the former digester tank wall (P-03). The only figure provided with sampling locations is H-102. None of these referenced samples were found on this figure. The only tank shown is the "sludge tank" and it is unclear how that is related to either the aeration or digester tank wall sampling locations. Please clarify.

6. Page 2. 6th paragraph. EPA was unable to find CMU Block-01 and CMU Block-02 on Figure H102, which EPA assumes is the referenced "Site Plan".

7. Page 2. Wipe samples. Please clarify if the hexane wipe samples were collected first or second at each sampling location.

8. Page 3. Paragraph 5.

   a. It is stated that the average PCB concentration in the wipe samples is 60.8 ppm. The units reported are incorrect. Wipe samples should be reported in µg/100 cm^2, not in ppm as there is no correlation between these units. Accordingly, cleanup standards that apply to *non-porous surfaces* may not be used interchangeably with the cleanup standards for *porous surfaces*.

   b. With respect to the use of saline versus hexane for wipe samples, the PCB wipe sampling guidance specifies that a solvent be used. Generally one would expect to see higher concentrations with a solvent as PCBs are hydrophobic. However, some of the variability seen in the data could be attributable to the concrete and how much if any of the concrete was removed as a function of the sampling.

9. Pages 3 and 4. Risk Characterization.

a. EPA typically requires that risk calculations for an EPC based on the 95% Upper Confidence Limit (UCL) of the Mean which we will use for site decisions. Thus, the use of an "average concentration" (as mentioned in paragraph 5 on this page) would not be appropriate.

b. The Town has provided no basis to support that dermal contact is the only pathway of concern. For a risk assessment, all pathways must be considered, not just the dermal pathway. While EPA may consider technical/structural limitations for engineered controls and/or barriers, the proposed risk-based remedial action must be supported. While the use of the building is infrequency, the building is still used. Please also be aware that EPA has seen inhalation as an important pathway in buildings, so it is relevant and must be considered.

10. Page 4. Conclusions. It is indicated here that *PCB bulk product wastes* were removed from the building interior in July 2013. However, previously on page 2, it indicated that the date was October 2012. Please clarify.

Please feel free to contact me should you have any questions.

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